U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 23, 2023

BY ECF AND EMAIL
The Honorable Richard J. Sullivan
United States Circuit Judge
United States Court of Appeals for the Second Circuit
500 Pearl St., Room 2530
New York, New York 10007

> Re: *United States v. Eduardo Rodriguez*, No. 12 Cr. 322-7 (RJS)
>   **Request for Order Directing U.S. Probation to Disclose Records**

Dear Judge Sullivan:

The Government submits this letter to respectfully request that chronologies maintained by the United States Probation Office, detailing Eduardo Rodriguez's supervision, be unsealed. The Government seeks these records in connection with its preparation for the upcoming revocation hearing scheduled in the case on April 19, 2023.

The chronologies maintained by the United States Probation Office contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government will disclose them to the defendant consistent with its obligations under Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972).

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IT IS HEREBY ORDERED THAT the United States
Probation Office shall provide the government with
the chronologies it maintains detailing Eduardo
Rodriguez's supervision.  The Clerk of Court is
respectfully directed to terminate the motion
pending at document number 694.

SO ORDERED.

Dated: March 23, 2023
New York, New York
_____
Hon. Richard J. Sullivan
United States Circuit Judge
Sitting by Designation
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Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: _____
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cc: Counsel of Record (by ECF)
      U.S. Probation Officer Alicia A. Black (by electronic mail)